



THE CITY OF NEW YORK  
**LAW DEPARTMENT**  
100 CHURCH STREET  
NEW YORK, NY 10007

HON. SYLVIA O. HINDS-RADIX  
*Corporation Counsel*

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LAUREN F. SILVER  
Assistant Corporation Counsel  
Phone: (212) 356-2507  
E-mail: lasilver@law.nyc.gov  
*E-mail and Fax Not For Service*

March 28, 2024

**BY ECF**

Honorable Mary Kay Vyskocil  
United States District Judge  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007-1312

Re: Herrera, et al. v. New York City Department of Education, et al.  
21-CV-07555 (MKV)

Dear Judge Vyskocil:

I am the Assistant Corporation Counsel in the Office of Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, and the attorney representing Defendants New York City Department of Education and Richard Carranza (hereinafter “Defendants”) in the above referenced matter. I write to respectfully request a two-week extension of time, from April 12, 2024, to April 26, 2024, for all parties to submit pretrial submissions. Defendants do not request an adjournment of the final pre-trial conference or trial start date. Plaintiffs consent to this request.

The reason for this request is multifold. First, the former Labor & Employment Law trial supervisor, Maria DeCastro, no longer works for the Corporation Counsel of the City of New York, and, as such, I presently bear sole responsibility for handling, supervising, and assigning all trials and hearings within this division. Second, in the last month, I have prepared two federal trials, *Eucharía Enechi v. The City of New York, et al.*, 20-CV-8911 (PAE) (BM), which was set to begin on February 26, 2024, and *Nichole Adams-Flores v. City of New York, et al.*, 18-CV-12150 (JMF) (KHP), which was set to begin on March 18, 2024. Though each matter settled on the eve of trial, considerable time and resources were spent for each in advance. Moreover, as the division’s trial supervisor, over the last two weeks, I assisted in the preparation and thereafter directly supervised two of our attorneys appearing for a hearing at the New York State Division of Human Rights. Finally, and putting aside these responsibilities, I have a pre-planned, short family vacation next week and thus will be out of the office from April 1, 2024, through April 3,

2024. Accordingly, and given the foregoing, the requested extension of time will provide further needed time to prepare Defendants' pre-trial submissions. I note, as well, that the parties will be appearing for a settlement conference before Magistrate Judge Netburn on April 18, 2024.

I thank the Court for its attention in this matter.

Respectfully submitted,

s/ Lauren F. Silver

Lauren F. Silver  
Assistant Corporation Counsel

cc: Counsel of Record

**Granted. SO ORDERED.** Pretrial submissions due 4/26.

Date: April 1, 2024  
New York, New York

Mary Kay Vyskocil  
Mary Kay Vyskocil  
United States District Judge